

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:14-CR-74-01-LM
)	
JOSHUA FIELDS)	

**DEFENDANT'S MOTION TO DIRECT
BUREAU OF PRISONS TO RELEASE FUNDS**

NOW COMES the Defendant, Joshua Fields, by and through counsel, Jaye L. Rancourt and requests this Honorable Court issue an order to the Bureau of Prisons releasing Mr. Fields' funds to the Strafford County House of Corrections.

IN SUPPORT OF THIS MOTION it is stated as follows:

1. At the end of March 2021, Mr. Fields was transported from the Bureau of Prisons to the Strafford County House of Corrections for a hearing scheduled in this Court.
2. The hearing has since been continued pending Mr. Fields' filing of the Motion for Compassionate Release which was filed on April 26, 2021.
3. Prior to leaving the Bureau of Prison facility, Mr. Fields had money in his account at the Bureau of Prisons for use for canteen, telephone calls and the like. Upon his transfer to the Strafford House of Corrections those funds in his account at the Bureau of Prisons did not follow him.
4. In order for Mr. Fields to make telephone calls, in order to communicate with his family, or to purchase any canteen including personal hygiene items, he needs access to the funds that are currently held in the Bureau of Prisons.

5. Due to the Covid-19 Pandemic, Mr. Fields has been unable to have any in-person visits with any family members restricting his ability to communicate with his family members to telephone calls. Due to his inability to access his funds currently held in the Bureau of Prisons, he has been unable to effectively communicate with his family members.

6. Mr. Fields has been limited in his ability to reach out to his counsel, limited to his ability to just call the office and leave a message for a call back, given his very limited funds.

7. While Mr. Fields has been provided limited personal care hygiene items by the Strafford County House of Corrections as part an “indegency package”, he has been unable to purchase adequate personal hygiene items including soap with which to wash his clothes.

8. Counsel has contacted the Government, by and through Attorney Seth Aframe, and does not have knowledge of the Government’s position at this time.

WHEREFORE Mr. Fields requests this Honorable Court:

A. Issue an order to the Bureau of Prisons to release his funds to the Strafford County House of Corrections; and,

B. Grant such other relief as justice and equity may require.

Respectfully submitted,
Joshua Fields, Defendant
By and through his attorneys

Date: April 26, 2021

/s/ Jaye L. Rancourt
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion to Direct Bureau of Prisons to Release Funds has been forwarded, even date herewith, and in the manner specified herein: electronically served through ECF: Assistant United States Attorney Seth Aframe, United States Attorney's Office, James C. Cleveland Federal Bldg., 55 Pleasant St., Room 352, Concord, New Hampshire 03301-3941 and U.S. Probation.

/s/ Jaye L. Rancourt
Jaye L. Rancourt, Esquire